

OBJECTIONS

H = hearing

R = relevance

F = Foundation /
authenticity

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DODORA UNIFIED COMMUNICATIONS, INC.

Plaintiff,

v.

DIRECT INFORMATION PVT. LTD., et al

Defendants.

Civil Action

No. 05-10016-NMG

PLAINTIFF'S WITNESS LIST

The plaintiff expects to call only one witness, Ron Garraud, the President and CEO of Dodora. The plaintiff reserves the right to call witnesses not on this list for purposes of rebuttal.

PLAINTIFF'S PROPOSED EXHIBIT LIST:

- 1- Reseller-Registrar Agreement between Dodora & Compana
- R** 2- ICANN Registrar Accreditation Agreement (Exhibit 2)
- H, R** 3- Letter from ICANN to Mr. Bernstein (Exhibit 3)
- 4- Agreements between Mr. Bernstein & Directi. (Exhibit 4)
- 5- Receiver's Application for Authority to Approve Contract (Exhibit 5)
- 6- Email from Mr. Garraud to Mr. Turakhia (Exhibit 6)
- H, R, F** 7- Old Dodora.net and Dodora.com webpage (Exhibit 7)
- H, R, F** 8- Affidavit of Ryan Brown (Exhibit 8)
- H, R, F** 9- Email from Helen @reg.ca (Exhibit 9)
- 10- Copy of Defendant's Petition for Expedited Bill of Review (Exhibit 10)
- 11- Copy of the Texas Court Order (Exhibit 11)
- 12- Letter from Mr. Bernstein to Mr. Turakhia (Exhibit 12)
- 13- Letter from Directi to Dodora customers (Exhibit 13)

Please note: Dodora has not provided copies of the documents, so Directi is unable to respond to all these potential exhibits.

14- Pool.com's affidavit (Exhibit 14)

15- Exhibit C from Bhavin's affidavit (15)

H, R, F 16- Email from VeriSign Customer Service To Ron Garraud (Exhibit 16)

17- Dodora's Profit and Loss Statement between June 2004 to Jan 2005. (Exhibit 17)

H, R, 18- Complaint in Canadian court filed by Pool.com against Dodora. (Exhibit 18)

H, R, F 18- All pleadings and papers filed with the Court, including affidavits attached thereto.

The plaintiff reserves the right to add to this list if necessary for rebuttal purposes.

June 1, 2005

Respectfully submitted,
DODORA UNIFIED COMMUNICATIONS, INC.
By its attorney;

/s/ David G. Baker

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Certificate of Service

The undersigned hereby states upon information and belief that the within Objection was served upon counsel for Direct Information by the Court's CM/ECF system, and I certify that a copy also was served by Email to counsel for the defendant at dchecker@PBL.COM.

/s/ David G. Baker

David G. Baker, Esq.